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March 24, 2021

VIA ECF

The Honorable Lorna G. Schofield
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Ramirez v. Group Short Term Disability, Long Term Disability
and Life Plan for Employees of ZB Company, Inc., et al.
Case No.: 20-cv-09624 (LGS)

Dear Judge Schofield:

The undersigned represents plaintiff Glenda Ramirez in the above-referenced ERISA disability action. Further to your Honor's order of March 19 (Docket No. 25), I write to clarify that my earlier statement about "working something out" (Docket No. 24) was intended as a reference to discovery, not settlement. To date, no settlement discussions have taken place.

At to part (2) of the order, plaintiff needs additional discovery in reference to her allegations that Hartford Life's conduct ran afoul of pertinent sections of the applicable Department of Labor regulations, which allegations, spelled out in ¶¶ 13, 17, 25-28 and 30-33 of the amended complaint, Hartford Life has denied. Having conferred with counsel for Hartford Life on the subject, it is believed that written interrogatories are the most efficient way to proceed (initially, at least), and if it meets with the Court's approval, plaintiff will serve same by April 7, with responses due May 7 (30 days later).

The application is **GRANTED**. Plaintiff shall serve any interrogatories by **April 7, 2021**, and Defendants shall serve responses by **May 7, 2021**.

By **April 8, 2021**, the parties shall jointly file a letter proposing a briefing schedule for any anticipated motions for summary judgment.

Dated: March 26, 2021
New York, New York

Respectfully submitted,

LAW OFFICE OF
CHRISTOPHER P. FOLEY, LLC

By: 
Christopher P. Foley


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE